WWR# 9702929

## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS (CHICAGO)

In Re: Kurtis J. Albrecht

Case No. 07-20861

Debtor, Chapter 13

Hon. Manuel Barbosa

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## PNC BANK, N.A.'S RESPONSE TO TRUSTEE'S NOTICE OF FINAL CURE PAYMENT

NOW COMES PNC Bank, N.A., successor in interest to CLC, pursuant Fed. Bankr. R. 3001(g) and disagrees with the Trustee's Notice as follows:

- 1. Respondent states that any pre-petition arrearage has not been cured. The amount of pre-petition arrearage remaining is \$2,174.45.
- 2. Respondent further states that the post-petition ongoing payments are not current. The amount past due is \$25,380. This Response and the itemized statement attached serve as a Supplement to Respondent's Proof of Claim.

THEREFORE, PNC Bank, N.A. does not agree that the plan is complete.

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

Date: June 22, 2012 By: /s/ Monette Cope

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Attorney for Creditor, PNC Bank, N.A.

## **PROOF OF SERVICE**

Creditor, PNC Bank, N.A. filed Response to Trustee's Notice of Final Cure Payment. All parties were served a copy of the Response on <u>June 22, 2012</u>. The Response was served upon Debtor(s) by depositing the same in the U.S. Mail at 180 N. LaSalle St., Chicago, Illinois postage prepaid as addressed below. The remaining parties were served by the Court's CM/ECF electronic noticing.

Kurtis J. Albrecht 218 N. Washington St. Carpentersville, IL 60110

Stephen J. Costello Attorney for Debtor Costello & Costello 19 N. Western Ave. Rt. 31 Carpentersville, IL 60110

Glenn B. Stearns Chapter 13 Trustee 801 Warrenville Road Suite 650 Lisle, IL 60532

Patrick S. Layng Office of the U.S. Trustee, Region 11 219 S. Dearborn St. Room 873 Chicago, IL 60604

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

By: <u>/s/ Audrey McClain</u>
Audrey McClain, Legal Assistant